

2012-312-C 238263

Afton Ellison
Senior Analyst
State Government Relations

August 10, 2012

### **VIA HAND DELIVERY**

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210



Re: Frontier Communications of the Carolinas, Inc. Petition Requesting the Commission's Intervention in Numbering Resources Determinations – Myrtle Beach Rate Center

Dear Ms. Boyd:

Frontier Communications of the Carolinas, Inc. ("Frontier") requests a state waiver from the Public Service Commission of South Carolina to grant assignment of their request to the North American Numbering Plan Administrator (NANPA) for additional resources in the Myrtle Beach rate center.

The Frontier Number Planning Group has determined there are no clean number blocks available in Myrtle Beach, South Carolina. A new thousand number block, in which Frontier will be the "Code-Holder", is needed to satisfy a Location Routing Number (LRN) request for a new Genband G6 voice gateway installation in the Myrtle Beach rate center. The new trunk gateway will allow next-generation Voice over Internet Protocol (VOIP) services to be offered in South Carolina. The new LRN assignment will be used to support Local Number Portability functionally in LATA 432 to allow a customer's existing telephone numbers to be ported to the new VOIP softswitch platform.

To qualify for an additional NXX in the Myrtle Beach rate center, Frontier must meet Months to Exhaust (MTE) and utilization requirements as established by the FCC and as stated in ATIS' Central Office Code Assignment Guidelines (COCAG). Per section 4.3.1 of the COCAG, the MTE and utilization requirements state a service provider must be 75% utilized in current numbering resources for the rate center and "demonstrate that existing codes for the rate center will exhaust within 6 months".

Frontier submitted a request to NANPA, attachment A, on August 1, 2012 for the assignment of 1,000 NXX DID's in the Myrtle Beach rate center and was subsequently denied on August 1, 2012 due to the required MTE and utilization levels (see NANPA's Part 3 confirmation for denial of resources, attachment B). Frontier demonstrated a 35.972% utilization level of current codes in the Myrtle Beach rate center with no anticipation of exhausting the remaining numbering inventory for Myrtle Beach in the next 6 months (see MTE jeopardy analysis worksheets, attachment C, for utilization and exhaust calculations).

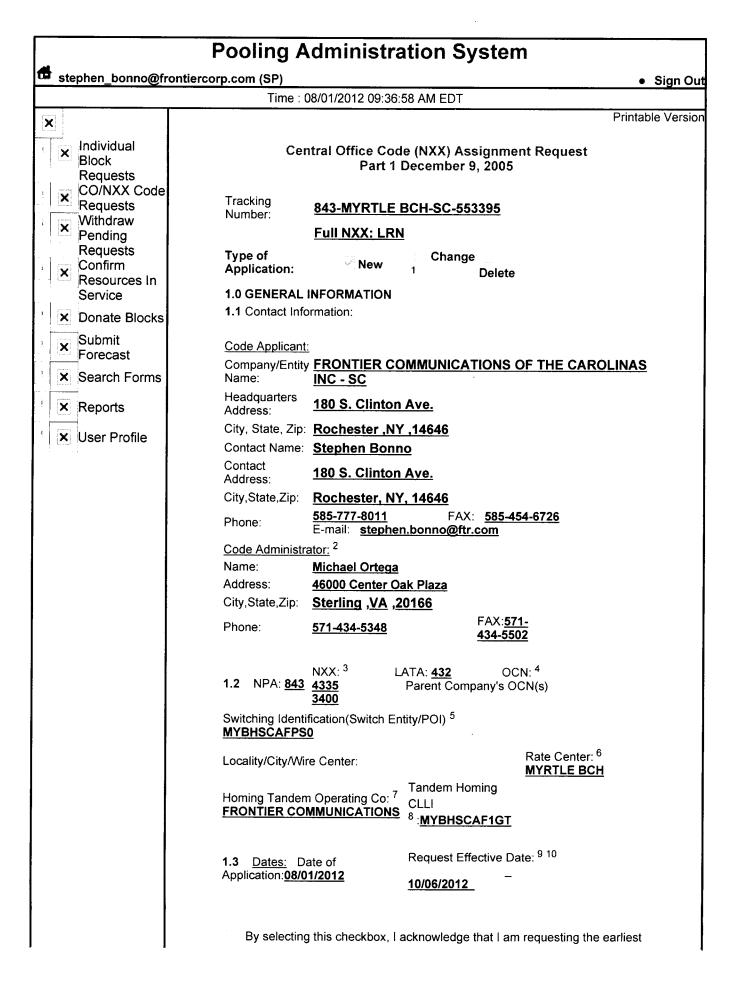
To accommodate the new Genband G6 voice gateway installation, Frontier is requesting the Public Service Commission of South Carolina to grant a state waiver for their numbering request in the Myrtle Beach rate center.

Please do not hesitate to contact my office at 803-250-9411 with any questions or concerns regarding this matter.

Sincerely,

Afton Ellison

# Attachment A



Request Expedited Treatment?	YesNo	<u>X</u>	
1.4 a) Type of company/e Local Exchange Carrier (ILE	entity requesting th	e code: <u>In</u> MRS, Other)	cumbent
b) Types of service:	Wireline (e	.g., Cellular - T	ype 2)
c) Code Assignment Pr	eference (Optiona	i) <u>843</u>	-231-7
d) Codes that are unde	sirable, if any		
e) Type of change(Marl	k <u>all</u> that apply)		
OCN-Intra-comp Tandem Homing CLI		ing Id Rate	e Center
OCN-Inter-comp Extend Reservation	eany <sup>12</sup> Effecti	ve Date LA	ATA
1.5 Type of Request (Initial, g	rowth, etc.)	Growth	
place code in service within 60 exhaust worksheet.  Pooling Indicator: 13 Y  1.6 NPA Jeopardy Criteria Ap	es No oply: Yes	No	
1.7 Code request for new ser	vice (Explain):		
			<del></del>
		•	
1.8 It is the code applicant's information into BIRRDS. The 4 cut-over for BIRRDS will not be completed.	l5-calendar day na	itionwide minin	num interval
Comments:			
		<del></del>	
I hereby certify that the above true and accurate to the bes has been prepared in accord Assignment Guidelines post (http://www.atis.org/atis/clc/ii	t of my knowledo lance with Centi ed to the ATIS V	ge and that th al Office Cod Veb Site	is application e (NXX)
application: 14			

Number **Planning** Signature of Code Applicant Title Date <sup>1</sup> Identify type and reason for change(s) in Section 1.4(e). <sup>2</sup> A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA. <sup>3</sup> The NXX field is required for any code request in which there is a change or the NXX is being returned. <sup>4</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia <sup>TM</sup> Routing Administration (TRA) on 732-699-6700. <sup>5</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia TM COMMON LANGUAGE CLLI TM Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.) <sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing. <sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier. <sup>8</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2. <sup>9</sup> Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines. <sup>10</sup> Requests for code assignment shall not be made more than six months prior to the requested effective date. <sup>11</sup> Select if you are the current Code Holder <sup>12</sup> Select if you are not the current Code Holder <sup>13</sup> The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not. <sup>14</sup> An incomplete form may result in delays in processing this request.

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Pooling Administration System				
stephen_bonno@frontiercorp.com (SP)  • Sign Out				
	e : 08/01/2012 09:37:33 AM EDT			
	Printable Version TBPAG Attachment 1 - March 19, 2007			
Requests CO/NXX Code Requests	Thousands-Block Application Form - Part 1A 843-MYRTLE			
Pending Requests Confirm Resources In Service	BCH-SC- 553395 Full NXX: LRN			
Donate Blocks Submit Forecast  Secret Forms	New i Disconnect			
Search Forms	GENERAL APPLICATION INFORMATION			
Reports 1.1 Contact I				
User Profile  Block Applica	int:			
Company Name:	FRONTIER COMMUNICATIONS OF THE CAROLINAS INC - SC			
Headquarters Address:	180 S. Clinton Ave.			
City, State, Zip:	Rochester, NY, 14646			
Contact Name:	Stephen Bonno			
Contact Address:	180 S. Clinton Ave.			
l l	Rochester, NY, 14646			
<u>777-8011</u>	FAX: <u>585-</u> 454-6726 E-mail: <u>stephen.bonno@ftr.com</u>			
<u>Pooling Admi</u> Contact Name:	nistrator: "  John Auerbach			
Contact Address:	1800 Sutter St. Ste. 780			
City,State,Zip	: Concord ,CA,94520			
Phone:	925-363-8706 FAX: 925-363-7684			
E-mail: <b>john.</b>	auerbach@neustar.biz			
1.2 General I	nformation:			
Check one :	No LRN needed LRN needed <sup>iii</sup> X			
NPA: <b>843</b>	4335 3400			
Number of Th	ousands-Blocks Requested : <b>1</b>			

City or Wire Center Name :	Rate Center: VI MYRTLE
Rate Center Sub Zone:	BCH
1.3 Dates:	
Date of Application: Vii	Requested Block Effective Date: viii
08/01/2012	10/06/2012
possible effective date the Adr	x, I acknowledge that I am requesting the earliest ministrator can grant. Please note that this only dministrator's processing time, however the request received.
Request Expedited Treatment	t? (See Section 8.6) YesNoX
1.4 Type of Service Provider	Requesting the Thousands-Block :
a) Type of Service Provider(LEC, IXC, CMRS, Other)	:Incumbent Local Exchange Carrier (ILEC)
b) Primary type of service B	Blocks to be used for : Wireline
c) Thousands-Block(s) (NX) 843-231-7	X-X) assignment Preference (Optional)
	X-X) that are undesirable for this assignment , if any
	RN purposes, indicate which block(s) you will be
keeping(the remainder of the	RN purposes, indicate which block(s) you will be blocks will be given to the pool) 843-xxx-7,
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Disconnect block : Yes	If Yes , list NPA-NXX-X	
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#### Remarks:

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (http://www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

Stephen Bonno

Engineer- 08/01/2012 Number Planning

Signature of Block Applicant

Title

Date

#### Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator s name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia<sup>TM</sup> LERG<sup>TM</sup> Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia<sup>TM</sup> Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI<sup>TM</sup> tandem of the facilities based provider xi. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

#### Foot Notes:

- ildentify the type of change(s) in Section 1.5.
- ii The Pool Administrator is available to assist in completing these forms.
- iii A CO Code application will also need to be submitted to the PA.
- <sup>iv</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- <sup>v</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI<sup>TM</sup> code of the switch /POI.
- vi Rate Center name must be a tariffed Rate Center.
- vii Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- viii Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- ix Select if you are the current Block Holder.
- x Select if you are not the current Block Holder
- xi Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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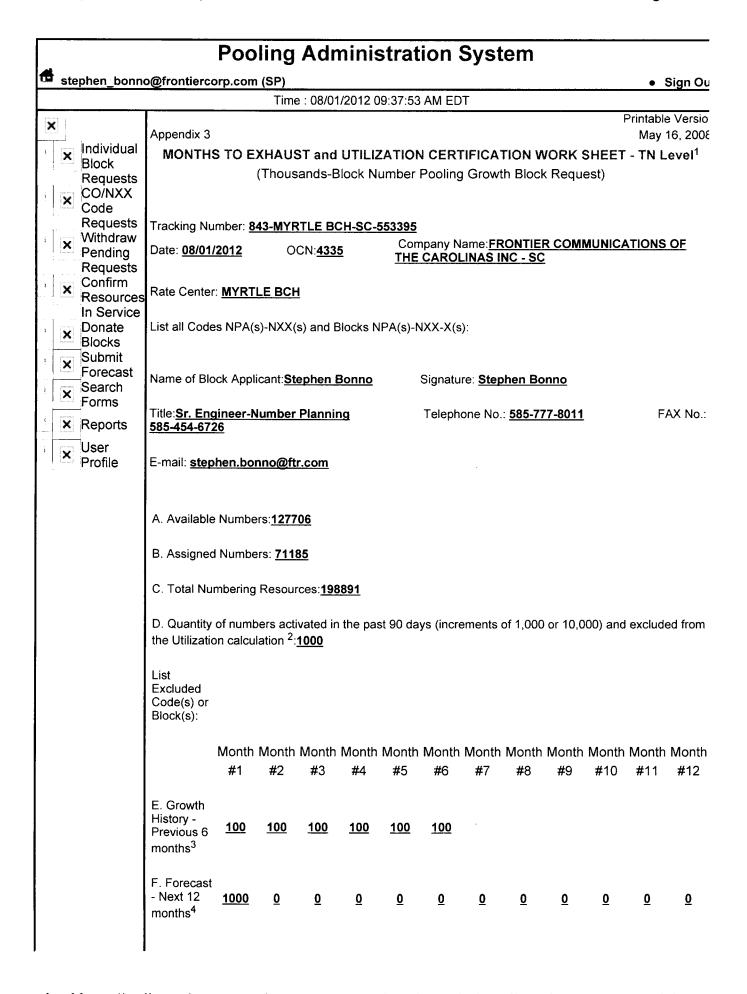
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Time: 08/01/201	12 09:38:12 AM I	EDT	
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November 21, 2003			Attachmen
ATIS-0300066.at3	minietrator'e l	Response/Confirm	ation
Fooling Au	TBPAG		ation
	843-MYRTLE BCH-SC- 553395	<u>.                                    </u>	
Date of Application:	08/01/2012	Effective Date:	
Date of Receipt:	08/01/2012	Date ofResponse:	08/01/2012
Service Provider Name:	FRONTIER C	OMMUNICATIONS	OF THE
(Telcordia <sup>TM</sup> LERG <sup>TM</sup> Routing Guide ) OCN:	4335		
NPAC SOA SPID :			
Pooling Administrator			
		ation:	925-363
John Auerbach	Contact Informa Phone:	ation:	925-363 8706
		ation:	
John Auerbach Signature of Pooling		ation:	
John Auerbach Signature of Pooling Administrator	Phone:	ation:	8706 925-363
John Auerbach Signature of Pooling Administrator John Auerbach	Phone: Fax:	ation: uerbach@neustar.l	925-363 7684
John Auerbach Signature of Pooling Administrator John Auerbach Name (print)	Phone: Fax:		925-363 7684
John Auerbach Signature of Pooling Administrator  John Auerbach  Name (print)	Phone: Fax:		925-363 7684 biz
John Auerbach Signature of Pooling Administrator  John Auerbach  Name (print)  Email:	Phone: Fax:	uerbach@neustar.l	925-363 7684 biz
John Auerbach Signature of Pooling Administrator  John Auerbach  Name (print)  Email:	Phone: Fax:	uerbach@neustar.l  Block Assigned Block Reserved Block Reservati	925-363 7684 biz
John Auerbach Signature of Pooling Administrator John Auerbach Name (print) Email:	Phone: Fax:	Block Assigned Block Reserved Block Reservatic Expiration Date:	925-363 7684 biz
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John Auerbach Signature of Pooling Administrator  John Auerbach  Name (print)  Email:	Phone: Fax:	Block Assigned Block Reserved Block Reservatic Expiration Date: Block/Code	925-363 7684 biz
John Auerbach Signature of Pooling Administrator John Auerbach Name (print) Email:	Phone:Fax:john.au	Block Assigned Block Reserved Block Reservatic Expiration Date: Block/Code Modified: Block/Code	925-363 7684 biz
John Auerbach Signature of Pooling Administrator  John Auerbach  Name (print) Email:  NPA-NXX or NPA-NXX-X:	Phone: Fax: john.at	Block Assigned Block Reserved Block Reservatic Expiration Date: Block/Code Modified: Block/Code	925-363 7684 biz
John Auerbach Signature of Pooling Administrator  John Auerbach  Name (print)  Email:  NPA-NXX or NPA-NXX-X:	Fax: john.au  (Yes or No): ber of TNs	Block Assigned Block Reserved Block Reservatic Expiration Date: Block/Code Modified: Block/Code Disconnected:	925-363 7684

	Explanation:  DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands'Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.  Request withdrawn.  Explanation:  Assignment activity suspended by the administrator.  Explanation:
	<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)  Back
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## Attachment C



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	<sup>6</sup> Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))
	than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).
	<sup>4</sup> Forecast of TNs needed in each following month, starting with the most recent month as Month #1. <sup>5</sup> To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less
	distant month as Month #1, and Month #6 as the current month.
	<sup>3</sup> Net change in TNs no longer available for assignment in each previous month, starting with the most
	<sup>2</sup> Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).
	<sup>1</sup> A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.
	Explanation:
	Total Numbering Resources(C)-Excluded Numbers(D)
	Utilization <sup>6</sup> Assigned Numbers(B) - Excluded Numbers(D) X 100 = 35.972
	1.
	Block Requested Available Numbers Months To Exhaust 1 127706 766.234
	Average Monthly Forecast(G)
	H. Months to Numbers Available for Assignment to Exhaust <sup>5</sup> Customers(A) =
	G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6):166.667